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13 DEVICES CORPORATION and EPSON  
14 ELECTRONICS AMERICA, INC.

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION  
19

20 15 IN RE TFT-LCD (FLAT PANEL)  
21 ANTITRUST LITIGATION

22 Master File No.: 3:07-MD-1827-SI  
23 Case No. 09-cv-5840-SI  
24 MDL No. 1827

25 This Document Relates to:

26 *27 Motorola Mobility, Inc. v. AU Optronics  
28 Corporation, et al., C 09-5840 SI*

29 **STIPULATION AND [PROPOSED]  
30 ORDER ON BRIEFING SCHEDULE  
31 FOR SUMMARY JUDGMENT  
32 MOTION ADDRESSING  
33 PLAINTIFF'S CLAIMS FOR  
34 INJURIES IN FOREIGN MARKETS**

1           The undersigned counsel, on behalf of Plaintiff Motorola Mobility, Inc. (“Motorola”) and  
 2 defendants AU Optronics Corporation and AU Optronics Corporation America, Chi Mei  
 3 Corporation, Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co.,  
 4 Ltd., Nexgen Mediatech, Inc. and Nexgen Mediatech USA, Inc., Chunghwa Picture Tubes, Ltd.  
 5 and Tatung Company of America, Epson Imaging Devices Corporation and Epson Electronics  
 6 America, Inc., HannStar Display Corporation, LG Display America, Inc. and LG Display Co.,  
 7 Ltd., Philips Electronics North America Corporation, Samsung Electronics Co., Ltd., Samsung  
 8 Semiconductor, Inc., and Samsung Electronics America, Inc., Samsung SDI Co., Ltd. and  
 9 Samsung SDI America, Inc., Sanyo Consumer Electronics Co., Ltd., Sharp Corporation and  
 10 Sharp Electronics Corporation, and Toshiba Corporation, Toshiba Mobile Display Co., Ltd.,  
 11 Toshiba America Electronic Components, Inc. and Toshiba America Information Systems, Inc.  
 12 (“Defendants”), parties to the above-entitled action, hereby stipulate as follows:

13           WHEREAS Defendants will file a Joint Motion for Summary Judgment addressing  
 14 Plaintiff’s claims for injuries in foreign markets under the Foreign Trade Antitrust Improvement  
 15 Act (the “Motion”);

16           WHEREAS the Motion involves issues of fact and law that cannot be adequately  
 17 presented in 25 pages;

18           WHEREAS Motorola and Defendants have agreed that an orderly schedule of the briefing  
 19 would be most efficient for the Court and the Parties;

20           THEREFORE the Parties agree as follows:

- 21           1.       Defendants shall submit the Motion by April 4, 2012. The page limit for the  
                   Memorandum in support of the Motion shall be 35 pages.
- 22           2.       Motorola shall submit its Opposition to the Motion by May 18, 2012. The page  
                   limit for the Opposition shall be 45 pages.
- 23           3.       Defendants shall submit a Reply by June 15, 2012. The page limit for the Reply  
                   shall be 30 pages.
- 24           4.       The Motion shall be heard on July 13, 2012, or at such time as the Court may  
                   choose.

1 Dated: March 27, 2012

2 MELVIN R. GOLDMAN  
3 STEPHEN P. FRECCERO  
4 DEREK F. FORAN  
5 MORRISON & FOERSTER LLP

6 By: /s/ Derek F. Foran  
7 DEREK F. FORAN

8 *Attorneys for Defendants*  
9 *Epson Imaging Devices Corporation*  
10 *and Epson Electronics America, Inc.*

11 *Also filed on behalf of AU Optronics*  
12 *Corporation and AU Optronics*  
13 *Corporation America, Chi Mei*  
14 *Corporation, Chimei Innolux Corporation,*  
15 *Chi Mei Optoelectronics USA, Inc., CMO*  
16 *Japan Co., Ltd., Nexgen Mediatech, Inc.*  
17 *and Nexgen Mediatech USA, Inc.,*  
18 *Chunghwa Picture Tubes, Ltd. and Tatung*  
19 *Company of America, Inc., HannStar*  
20 *Display Corporation, LG Display*  
21 *America, Inc. and LG Display Co., Ltd.,*  
22 *Philips Electronics North America*  
23 *Corporation, Samsung Electronics Co.,*  
24 *Ltd., Samsung Semiconductor, Inc., and*  
25 *Samsung Electronics America, Inc.,*  
26 *Samsung SDI Co., Ltd. and Samsung SDI*  
27 *America, Inc., and Sanyo Consumer*  
28 *Electronics Co., Ltd., Sharp Corporation*  
29 *and Sharp Electronics Corporation, and*  
30 *Toshiba Corporation, Toshiba Mobile*  
31 *Display Co., Ltd., Toshiba America*  
32 *Electronic Components, Inc. and Toshiba*  
33 *America Information Systems, Inc.*

34 JEFFREY H. HOWARD  
35 JEROME A. MURPHY  
36 JASON C. MURRAY  
37 JOSHUA C. STOKES  
38 CROWELL & MORING LLP

39 By: /s/ Jason C. Murray  
40 JASON C. MURRAY

41 *Attorneys for Plaintiff*  
42 *Motorola Mobility, Inc.*

1       **Attestation:** I, Derek F. Foran, attest that concurrence in the filing of this document has been  
2       obtained from co-signatory Jason C. Murray.

3       Dated: March 27, 2012

4       By: /s/ Derek F. Foran

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7       **[PROPOSED ORDER]**

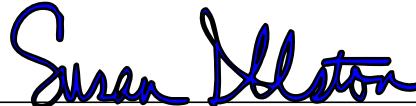
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9       Pursuant to the Parties' stipulation set forth above, IT IS SO ORDERED.

10

11       Dated: 3/27/12

12

13         
Hon. Susan Illston  
United States District Judge